

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

Case No. 9:22-cv-80369-Matthewman

KELLY STONE, RICHARD BUTLER, and
DERMACARE PACKAGING & PRIVATE
LABEL, LLC,

Plaintiffs,

v.

OMRI SHAFRAN, DIMITRI MENIN, and
TEXAS MEDICAL TECHNOLOGY, LLC,

Defendants.

JOINT PROPOSED LITIGATION SCHEDULE

Pursuant to the Court's instruction, Plaintiffs Kelly Stone, Richard Butler, and DermaCare Packaging & Private Label ("Plaintiffs") and Defendants Omri Shafran, Dimitri Menin, and Texas Medical Technology, LLC ("Defendants"), collectively, the "Parties," have conferred and offer to the Court the following proposed schedule of litigation deadlines in preparation for and preceding the trial in this action, scheduled for February 12, 2024.

Plaintiffs' expert disclosures	8/14/2023
Defendants' expert disclosures	9/14/2023
Plaintiffs' expert rebuttal	9/30/2023
Exchange of witness lists	10/9/2023
Discovery deadline	11/6/2023

Dispositive motions and Daubert motions due	11/20/2023
Mediation deadline	To be set by the Court
Motions in limine and remaining pre-trial motions	To be set by the Court
Joint pre-trial stipulation and deposition designations due	To be set by the Court
Objections to deposition designations due	To be set by the Court
Jury instructions due	To be set by the Court
Calendar call	2/5/2024
Trial	2/12/2024

The Parties agree that with the trial set for February 12, 2024, just under a year from now, some remaining deadlines – *e.g.*, the deadline to file pretrial stipulation(s), to serve deposition designations, to object to deposition designations, to file jury instructions, and the mediation deadline – are best determined by the Court.

Following collaboration between counsel for the Parties, both Plaintiffs and Defendants jointly respectfully request that the Court enter an order setting forth the schedule and deadlines presented above.

Respectfully submitted,

Date: March 30, 2023

Signed: *s/Denise Calle*

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Date: March 30, 2023

Signed: *s/Andrew R. Schindler*

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